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15

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
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20 JOSE GONZALEZ, on behalf of himself and
all others similarly situated,
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22 Plaintiffs,

23 v.

24 FALLANGHINA, LLC DBA PAISAN
OSTERIA; LONGBRANCH BERKELEY
LLC; HAL BRANDEL; AND WALTER
25 WRIGHT,

26 Defendants.
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Case No. 16-cv-01832-MEJ

**JOINT STIPULATION AND AMENDED
[PROPOSED] ORDER CONTINUING
CASE MANAGEMENT CONFERENCE
AND EXTENDING RULE 26(F)
REPORT, INITIAL DISCLOSURES, AND
CASE MANAGEMENT STATEMENT
FILING DEADLINES**

1 WHEREAS, Plaintiff JOSE GONZALEZ (“Plaintiff”) filed a First Amended
2 Complaint (“Complaint”) against Defendants FALLANGHINA, LLC DBA PAISAN OSTERIA,
3 LONGBRANCH BERKELEY LLC, HAL BRANDEL, AND WALTER WRIGHT (collectively
4 “Defendants”) in the Northern District of California on May 31, 2016;

5 WHEREAS, on April 11, 2016, Judge Maria-Elena James issued an Order Setting
6 Initial Case Management Conference and ADR Deadlines;

7 WHEREAS, on May 17, 2016, attorneys Garry Mathiason, Kai-Ching Cha and
8 Danton Liang filed their respective Notices of Appearance in this litigation (Doc No. 12, 16, 17), and
9 attorney Scott R. Dallas filed a Notice of Change of Counsel, withdrawing as attorney of record for
10 Defendants (Doc. No. 19).

11 WHEREAS, Judge James scheduled the Initial Case Management Conference to be
12 heard on July 7, 2016 at 10:00 a.m.;

13 WHEREAS, Judge James set the last day to file a Rule 26(f) Report, complete initial
14 disclosures or state objection in Rule 26(f) Report, and file a Joint Case Management Statement on
15 June 30, 2016 ;

16 WHEREAS, attorney Kai-Ching Cha, who will be the primary shareholder
17 representing Defendants in this litigation, is not available for the Initial Case Management
18 Conference on July 17, 2016 due to out of state travel from July 5, to July 15, 2016;

19 WHEREAS, the parties have agreed to request that the Initial Case Management
20 Conference be continued to July 21, 2016;

21 WHEREAS, the parties also seek to extend the filing deadlines for the Rule 26(f)
22 Report, initial disclosures, and Joint Case Management Statement to July 14, 2016;

23 WHEREAS, the parties’ request is not made for the purpose of delay or any other
24 improper purpose.

AMENDED

~~[PROPOSED]~~ ORDER

Based upon the joint stipulation of both parties in the above-captioned case, and good cause appearing, it is hereby ordered that the parties' July 7, 2016 Initial Case Management Conference shall be continued to July ²⁸~~21~~, 2016. It is also hereby ordered that the parties' deadline of June 30, 2016 to file a Rule 26(f) Report and Joint Case Management Statement and exchange initial disclosures be extended to July 14, 2016. A joint case management statement shall be filed by July 21, 2016.

IT IS SO ORDERED.Dated: June 28, 2016

HONORABLE MARIA-ELENA JAMES
United States Magistrate Judge

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